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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN MAYORGA,
Plaintiff,

vs.

CRISTIANO RONALDO,
Defendant.

Case No. 2:19-cv-00168-JAD-DJA

**STIPULATION AND ORDER
REGARDING DEPOSITIONS**

Plaintiff, Kathryn Mayorga, by and through her attorneys, Stovall & Associates, Defendant, Cristiano Ronaldo, by and through his attorneys, Christiansen Trial Lawyers, (collectively referred to as the "PARTIES") and deponents Joseph Bongiovi, Kathy Bongiovi and Bongiovi Dispute Resolutions (collectively referred to as "BONGIOVI") by and through their attorneys, Pyatt Silvestri, enter into the following stipulation and order:

WHEREAS the PARTIES participated in a mediation, with BONGIOVI acting as the Mediator (the "Mediation"), on January 12, 2010, and

WHEREAS the PARTIES wish to take depositions of Joe Bongiovi, Kathy Bongiovi and Bongiovi Dispute Resolutions, and

WHEREAS NRS 48.109 states that proceedings of a mediation are to be regarded as settlement negotiations and that no admission, representation or statement made during the



1 session, not otherwise discoverable or obtainable, is admissible as evidence or subject to
2 discovery, and that a mediator is not subject to civil process, and

3 WHEREAS the PARTIES and BONGIOVI are willing to waive any privilege or
4 confidentiality, as might be contemplated by NRS 48.109, related to the Mediation,

5 It is hereby agreed and stipulated to:

6 1. The PARTIES waive any confidentiality concerning the mediation.

7 2. The PARTIES will provide BONGIOVI's counsel, James P.C. Silvestri, with
8 copies of any documents that are intended to be used at the depositions at least one week prior to
9 the depositions.

10 3. If any documents provided by the PARTIES are subject to any protective or
11 confidentiality Order, BONGIOVI and his counsel agree to abide by such Order just as the
12 PARTIES are required to do.

13 4. At least one week prior to the depositions, BONGIOVI will provide to the
14 PARTIES any documents still within BONGIOVI's possession related to the Mediation.

15 5. BONGIOVI waives any right to claim privilege or confidentiality related to NRS
16 48.109.

17 6. The PARTIES expressly release BONGIOVI from any and all claims related to or
18 arising in any way from the Mediation and grant BONGIOVI immunity from all claims, lawsuits,
19 actions, legal or otherwise, related to or arising from the Mediation or from any involvement that
20 BONGIOVI had related to any dispute between the Parties, more fully described by the pleadings
21 filed herein.
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7. The depositions will be conducted via Zoom or similar format. The depositions will be scheduled as follows: Kathy Bongiovi on May 11, 2021 at 3:00 p.m. (PDT); and Joseph Bongiovi on May 12, 2021 at 9:00 a.m. (PDT).

Respectfully Submitted this 29th day of April, 2021.

CHRISTIANSEN TRIAL LAWYERS

STOVALL & ASSOCIATES

/s/ Keely A. Perdue, Esq.

/s/ Leslie M. Stovall, Esq.

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Joseph Bongiovi, Kathy Bongiovi,

and Bongiovi Dispute Resolutions

ORDER

IT IS SO ORDERED.

DATED this 30th day of April, 2021.



U. S. MAGISTRATE JUDGE

